

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a	§	CIVIL ACTION NO. 6:20-cv-487-ADA
BRAZOS LICENSING AND	§	CIVIL ACTION NO. 6:20-cv-488-ADA
DEVELOPMENT,	§	CIVIL ACTION NO. 6:20-cv-489-ADA
Plaintiff,	§	CIVIL ACTION NO. 6:20-cv-490-ADA
v.	§	CIVIL ACTION NO. 6:20-cv-491-ADA
ZTE CORPORATION, ZTE (USA)	§	CIVIL ACTION NO. 6:20-cv-492-ADA
INC., AND ZTE (TX), INC.	§	CIVIL ACTION NO. 6:20-cv-493-ADA
Defendants.	§	CIVIL ACTION NO. 6:20-cv-494-ADA
	§	CIVIL ACTION NO. 6:20-cv-495-ADA
	§	CIVIL ACTION NO. 6:20-cv-496-ADA
	§	CIVIL ACTION NO. 6:20-cv-497-ADA
	§	JURY TRIAL DEMANDED

**PLAINTIFF’S RESPONSE TO
STATUS REPORT REGARDING PENDING VENUE MOTIONS**

WSOU respectfully files this Response to Defendants’ Third Status Report Regarding Pending Venue Motions.

WSOU remains committed to completing venue discovery and filing its response to Defendants’ pending motion to dismiss *before* June 4, 2021 but is waiting (1) on ZTE to finalize its production and (2) for a resolution of the discovery dispute WSOU raised with the Court in its April 26, 2021 email, seeking *inter alia* a deposition of ZTE Corporation. WSOU is prepared to move forward with a deposition of ZTE Corporation immediately upon an order from the court compelling ZTE to produce a witness.

Dated: May 6, 2021

Respectfully submitted,

/s/ Ryan Loveless

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on May 6, 2021 a true and correct copy of the foregoing document was served upon all counsel of record via the Court's electronic delivery system under this Court's Local Rules.

/s/ Travis Richins

Travis Richins